

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
MARK BILLUPS	:	VIOLATIONS:
VICTOR TORRES	:	18 U.S.C. § 1029(b)(2) (conspiracy - 1
YVONNE MADISON	:	count)
		18 U.S.C. § 1029(a)(2) and (b)(1)
		(credit card fraud - 9 counts)
		18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Defendant VICTOR TORRES was employed by Aramark Corporation as a Supervisor in the Restocking Department, and was responsible for ensuring that luxury suite boxes at the Wachovia Center and Citizen's Bank Park were restocked with food and drinks after use by corporate clients.

2. Defendant YVONNE MADISON was employed by Aramark Corporation as a housekeeper at the Wachovia Center.

3. Defendant MARK BILLUPS knew and associated with defendants VICTOR TORRES and YVONNE MADISON.

4. From in or about June 2002, through in or about November 2004, in the Eastern District of Pennsylvania and elsewhere, defendants

**MARK BILLUPS,
VICTOR TORRES, and
YVONNE MADISON**

conspired and agreed, together and with others known and unknown to the grand jury, to commit an offense against the United States, that is, to knowingly and with the intent to defraud use and traffic in unauthorized access devices that is, credit card numbers, in violation of Title 18, United States Code, Section 1029(a)(2).

MANNER AND MEANS

It was part of the conspiracy that:

5. Defendants VICTOR TORRES and YVONNE MADISON, who had access to client credit card numbers because of their employment at the Wachovia Center and at Citizens Bank Park, stole those numbers and provided them to defendant MARK BILLUPS.

6. Defendant MARK BILLUPS made unauthorized use of the stolen credit card numbers provided to him by defendants VICTOR TORRES and YVONNE MADISON.

7. Defendant MARK BILLUPS used the stolen credit card numbers to pay bills for various people, who, in exchange, gave BILLUPS cash.

8. Defendant MARK BILLUPS paid cash or provided other services to defendants VICTOR TORRES and YVONNE MADISON in exchange for the stolen credit card numbers.

OVERT ACTS

In furtherance of the conspiracy, defendants MARK BILLUPS, VICTOR TORRES and YVONNE MADISON committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. From in or about the summer of 2002 until in or about November 2003, defendant VICTOR TORRES took restocking reproduction sheets, which contained credit card numbers of corporate clients of the Wachovia Center and Citizens Bank Park, from luxury suite boxes.

2. From in or about the summer of 2002 until in or about November 2003, defendant VICTOR TORRES gave at least 150 credit card numbers to defendant MARK BILLUPS.

3. From in or about April 2004 until in or about November 2004, defendant YVONNE MADISON took credit card numbers from documents to which she had access through the Wachovia Center.

4. From in or about April 2004 until in or about November 2004, defendant YVONNE MADISON gave approximately 30 credit card numbers to defendant MARK BILLUPS.

5. On or about November 7, 2003, defendant MARK BILLUPS used a cellular telephone to pay PECO and PGW bills, using a stolen credit card number, for an individual who had paid him cash.

6. On or about November 13, 2003, defendant MARK BILLUPS used a cellular telephone to pay a Philadelphia Parking Authority bill and an AT&T bill, using a stolen credit card number, for an individual who had paid him cash.

7. On or about January 29, 2004, defendant MARK BILLUPS used a cellular telephone to pay a PGW bill and an AT&T bill, using a stolen credit card number, for an individual who had paid him cash.

8. On or about October 13, 2004, defendant MARK BILLUPS used a cellular telephone to pay a PGW bill and an AT&T bill, using a stolen credit card number, for an individual who had paid him cash.

All in violation of Title 18, United States Code, Section 1029(b)(2).

COUNTS TWO THROUGH TEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 3 and 5 through 8 of Count One are realleged here.
2. On or about the dates set forth below, in the Eastern District of Pennsylvania, defendants

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knowingly and with the intent to defraud used, and aided and abetted the use of, unauthorized access devices that is, the following credit cards, using the following victims' names, to obtain things of value aggregating \$1,000 or more during a one-year period, thereby affecting interstate and foreign commerce.

COUNT	DATE	CREDIT CARD	VICTIM	AMOUNT OF LOSS
2	June 2002	American Express	P.H.	\$2,527.63
3	October 2002	Mastercard	M.D.	\$2,949.54
4	January 2003	VISA	J.S.	\$4,814.65
5	January 2003	American Express	S.C.	\$2,670.74
6	January 2003	Mastercard	E.F.	\$1,828.01
7	August 2003	VISA	J.S.	\$1,600
8	November 2003	VISA	S.S.	\$1,246.25
9	March 2004	Mastercard	A.Q.	\$1,460.58
10	June 2004	VISA	R.T.	\$3,800

In violation of Title 18, United States Code, Sections 1029(a)(2) and(b)(1) and 2.

FOREPERSON

**PATRICK L. MEEHAN
UNITED STATES ATTORNEY**

